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FEDERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

22 November 1998

Federal Communications Commission (FCC) 1919 "M" Street N.W., Room #202 Washington, D.C. 20554

Refer to: WT DOCKET No. 98-143

Ladies and Gentlemen:

Thank you for this opportunity to offer serious comments and suggestions to make your job most economical and efficient. However, it is even more critical that we both must recognize the educational opportunities Amateur/HAM radio has to promote the challenges of our sphere of scientific wonders for our present and future generations.

- (#1). In the World Wars of I & II HAM Radio amateurs were known to be fully or partially qualified for radio/electronic activities. Their interests had pre-screened them and saved time and money for our government at a most critical time. My comments are not mine alone but tell of unmotivated youth becoming self-disiplined that encouraged them to study sciences in schools, stay in school, learn the taste of and for education, for self improvement and self-worth. Many went from humble low pay jobs to become technicians, salesmen, engineers even beyond to the professions such as the medical, legal, political and management fields. Senator Barry Goldwater and Herbert Hoover, Jr. come to mind. These people did not succumb to "Dumbing Down" and Amateur Radio was a big factor in their developement.
- (#2). The present plan(s) do not meet the criteria of QUALITY either to the individuals nor the economic and safe future of the USA. I say 'plans' because this is not the first time it has been brought up and even so there have been errors, inconsistancies and rush to compromise. THEREFOR I SUGGEST THAT

THIS PLAN BE SIMPLIFIED BY THE FOLLOWING MEANS:

(A). That the NOVICE CLASS be dropped and those currently holding a NOVICE License be given a temporary TECHNICIAN Class license to expire after three years unless they pass the 5-word per minute code test,

(B). The TECHNICIAN CLASS shall be identical to the present "TECH_PLUS" test with its present 5-wpm code test. and with additional privileges of "CW"-operation only, at a maximum output power of 200-watts, in the present CW-portions of the 10-meter, 30-meter, 40-meter and 160-meter bands.

(C). The GENERAL CLASS shall remain as it currently exists except that a 12-wpm code test speed replace the present 13-wpm. NOTE: The choice of either 12 or 13-wpm would be

an acceptable compromise.

(D). The ADVANCED CLASS shall remain as presently

constituted. (NO CHANGE).

(E). The EXTRA CLASS shall remain as it is today. IF you members of the FCC feel that 20-wpm code test is impossible for todays students and adults, it should not be dropped below 15-wpm. I remind you however that many of our younger and oldest plus many handicapped seem to have gotten this far.

- (#3). (A). You undoubtedly must be feeling some pressure from a number of apparently insecure souls that have little self-confidence in their ability or a combination of laziness and jealousy. However, you, as people of proven ability and stature must recognize that we all have had problems to solve in order to achieve various goals, to get ahead, both as individuals as well as helping our country. I hope and pray that you will not contribute to or apathetically condone this obvious "Dumbing Down" policy. Citizens Band is the band for the talking head of Personal Radio as a mere social gab-fest.
- (B). PUBLIC SERVICE is one of the best known contributions of us "Hams". Earthquakes, floods, fires, lost children, downed aircraft, marine problems, snow storms and myriad other situations. Their self-discipline leads them to train, including the ARRL "ARES" and Field Day programs to provide their own equipment, transportation and time, all at no cost to Federal, State or local governments. They provide the basic skills that normally qualifies them to aid our servicemen via the "MARS" programs and the Search & Rescue services of the Civil air Patrol (CAP). The federal FEMA people use our services in their "VOPEX" emergency drill in and near nuclear plants. We have historically helped the AMERICAN RED CROSS and smaller local entities often because "Hams" are "already there" or first on the Cellular phones will update in some areas but satellites have failed and causes unpredictable problems. It is only a matter of time when terrorists will start to jam them or otherwise impede their use at times of their choosing. Amateur Radio is like an insurance policy, --- it is there if and when you need it.
- (C). We provide the ARRL VOLUNTEER EXAMINERS (VEC). ARRL has a enviable record in organizing and coordinating Interference (RFI) work, Official Observers (OO) and emergency traffic programs, etc...
- (#4). Our older hams used to tell about their ham tests requiring the drawing of schematics of oscillators and identifying the different ones; schematics of power amplifiers with a written description of how it worked, etc...knowledge and real understanding. The "True and False test" and the so-called 'multiple-guess' tests cut down on true learning and often the best or better technical minds don't have photographic memories so the last roughly 35-years have tested memories rather than basic technical knowledge or ability to study, to learn and therefore to eventually contribute to the scientific and economic well-being of their families, the industry and this country.

The idea of lowering the "STANDARDS" just for the numbers game and making your job easier is very tempting to many. It saves Statesmanship and the defending of the EDUCATIONAL, PUBLIC SERVICE AND RELATED IDEAS THAT AMATEUR/HAM RADIO PEOPLE HAVE CONTRIBUTED. The educational instruction provided by so many hams to those seeking technical knowledge does not lend itself to 'the numbers game'. The learning is clearly unstructured but provides a variety of voluntary teachers and methods. As hams are individuals, so the group is not without fault. The hams normally did their own policing with back-up by the FCC's Field Operations. The FCC has had enforcement problems with a relatively few of the current ones, so it puzzles many of us why you want to lower the standards so that the problem will grow and further embarrass the FCC, ARRL and the more intelligent and considerate amateurs. Lower educational tests & skills will cause more interference problems and put the FCC and the amateur community in a bad light with the general public---and that is what we hope that you will help us avoid. The present proposal by the FCC or (?) the ARRL should be basically ignored or thrown out. I am a Life Member of ARRL and have generally considered myself a very loyal supporter, but not with the current proposals. Further, we remember the confusion and bitterness caused by the Incentive Licensing Proposals a decade or so ago. FCC ALREADY PROVIDES A NO-CODE GROUP KNOWN AS CITIZEN BAND. Do you feel that it is a "MODEL" Operation? Is it possible that you are being pressured to dumb-down amateur radio so that it will be an "undisciplined chaos" as happened to the Citizen Band?

Respectfully submitted,

Frank E. Brooks

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P.S. I would greatly appreciate being kept informed about this docket and problem and would like to be informed of all public meetings to be held in the Washington, D.C. area. When, where, time & date. e-mail= frankw4umc@aol.com or at my address or tel.no. above. Thank you.

cc: files, 8 to FCC, arrl/ds, n4mm,et al, txt:fcc